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Attorney for Plaintiff,
IAN CLAIR MACDOWELL,

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

IAN CLAIR MACDOWELL,

Plaintiff,

v.

COMMISSIONER OF SOCIAL SECURITY,

Defendant.

CASE NO. 2:21-cv-00729-AC

STIPULATION AND ~~PROPOSED~~ ORDER
RE MODIFICATION OF SCHEDULING
ORDER

Subject to the approval and any further orders of the Court, the parties, by and through counsel of record, stipulate and agree that the scheduling order for Social Security cases should be modified and Plaintiff's time to move for summary judgment should be extended from 7/15/2022 to 8/1/2022, all other deadlines to be determined by reference to the Court's scheduling order and that good cause supports the extension of time.

This is Plaintiff's first request for modification of the scheduling order. Good cause supporting the extension of the filing deadline includes that despite diligence counsel needs more time to complete editing and revising Plaintiff's summary judgment motion to meet professional standards in the development and presentation of issues without prejudice to Plaintiff because of the size of the administrative record and novel issues associated with benefits applications filed after March 2017. This request is made in good faith, without dilatory motive and not for purposes of undue delay or to prejudice the interest of any party. Defendant does not object to the modification of the scheduling order and stipulates to Plaintiff's good cause.

SO STIPULATED AND AGREED, July 13, 2022

WEEMS LAW OFFICES

PHILLIP A. TALBERT,
United States Attorney
PETER K. THOMPSON
Acting Regional Chief Counsel,
Region IX, Soc. Sec. Admin
PATRICK WILLIAM SNYDER
Sp. Asst. U.S. Attorney

/s/Robert C. Weems

By: Patrick William Snyder


ROBERT C. WEEMS,
Attorney for Plaintiff

PATRICK WILLIAM SNYDER
Sp. Asst. U.S. Attorney,
Attorney for Defendant
(per email authorization)

[PROPOSED] ORDER

SO ORDERED

DATED: July 18, 2022


ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE